

LIPSON NEILSON P.C.  
JOSEPH P. GARIN, ESQ.  
Nevada Bar No. 6653  
MEGAN H. HUMMEL, ESQ.  
Nevada Bar No. 12404  
9900 Covington Cross Drive, Suite 120  
Las Vegas, Nevada 89144  
(702) 382-1500 - Telephone  
(702) 382-1512 - Facsimile  
[jgarin@lipsonneilson.com](mailto:jgarin@lipsonneilson.com)  
[mhummel@lipsonneilson.com](mailto:mhummel@lipsonneilson.com)

*Attorneys for Defendant  
Schroeter Goldmark & Bender, P.S.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

DIAMOND RESORTS INTERNATIONAL,  
INC., a Delaware corporation; DIAMOND  
RESORTS CORPORATION, a Maryland  
corporation, DIAMOND RESORTS U.S.  
COLLECTION DEVELOPMENT, LLC, a  
Delaware limited liability company, and  
DIAMOND RESORTS MANAGEMENT, INC.,  
an Arizona corporation

Plaintiffs,

vs.

REED HEIN & ASSOCIATES, LLC d/b/a/  
TIMESHARE EXIT TEAM, a Washington  
limited liability company; BRANDON REED,  
an individual and citizen of the State of  
Washington; TREVOR HEIN, an individual  
and citizen of Canada; THOMAS  
PARENTEAU, an individual and citizen of the  
State of Washington; HAPPY HOUR MEDIA  
GROUP, LLC, a Washington limited liability  
company; MITCHELL R. SUSSMAN, ESQ.,  
d/b/a THE LAW OFFICE OF MITCHELL  
REDD SUSSMAN & ASSOCIATES, an  
individual and citizen of the State of  
California; SCHROETER, GOLDMARK &  
BENDER, P.S., a Washington professional  
services corporation; and KEN B. PRIVETT,  
ESQ., a citizen of the State of Oklahoma,

Defendants.

CASE NO.: 2:17-cv-03007-APG-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME TO ANSWER  
SECOND AMENDED COMPLAINT  
[ECF 157]**

**(Fourth Stipulation)**

**STIPULATION AND ORDER TO EXTEND TIME TO ANSWER**  
**SECOND AMENDED COMPLAINT**  
**(Fourth Stipulation)**

The parties above-named, by and through their respective counsel, agree and stipulate as follows:

1. On November 25, 2019, this Court granted in part TET Defendants and HHMG's Motions to Dismiss (hereinafter, the "MTD Order"). [ECF No. 141].

2. The MTD Order permitted former named Plaintiff Diamond Resorts Corporation ("DRC") until December 23, 2019 to file a Second Amended Complaint ("SAC").

3. On December 20, 2019, the Court granted a joint stipulation filed by DRC and all named Defendants to extend DRC's deadline to file its Second Amended Complaint ("SAC") to January 12, 2020, and to permit the Defendants' to file their responses to the SAC thirty (30) days later. [ECF No. 144].

4. On January 09, 2020, the Court granted a second joint stipulation filed by the parties to extend DRC's deadline to file the SAC for an additional thirty (30) days, to February 12, 2020. The stipulation also permitted the Defendants to file their responses to the SAC 30 days after the SAC is filed (March 13, 2020). [ECF No. 146].

5. On February 11, 2020, DRC filed a motion to extend the deadline to file its SAC to February 26, 2020 ("Motion to Extend"). [ECF No. 152]. TET Defendants filed their response in opposition to DRC's Motion to Extend on February 14, 2020. [ECF No. 154]. DRC's Reply in Support of the Motion to Extend was filed on February 19, 2020. [ECF No. 156].

6. Plaintiff filed the SAC on February 26, 2020. [ECF No. 157]. On March 3, 2020, the Court granted Plaintiff's Motion to Extend. [ECF No. 161].

7. On March 11, 2020, Defendants Ken B. Privett, Esq. ("Privett") and Mitchell R. Sussman, Esq. d/b/a The Law Offices of Mitchell Reed Sussman & Associates ("Sussman") filed their respective Answers to Plaintiff's SAC. [ECF Nos. 162 and 163].

1           8.       Given the two (2) prior joint stipulations referenced above, on March 12,  
2       2020, a Stipulation and Order was filed stating that the Defendants' TET Defendants,  
3       HHMG, and SGB will file their by March 27, 2020 (30 days after the SAC was filed) to  
4       file their responses to the SAC [ECF No. 164].

5           9.       Now, the parties have agreed that Defendants may have an additional  
6       fourteen (14) days to file a responsive pleading, making the deadline to respond  
7       Tuesday, April 7, 2020.

8           10.      Pursuant to Local Rule 6-1(b), the parties state the reason for the  
9       extension is that counsel requires more time to evaluate and respond the Plaintiffs'  
10      Second Amended Complaint. The parties have entered into this agreement in good  
11      faith and not for purposes of delay. This request will not cause any prejudice to the  
12      parties in this matter.

13      Dated this 27<sup>th</sup> day of March, 2020.

Dated this 27<sup>th</sup> day of March, 2020.

14      GREENSPOON MARDER LLP

LIPSON NEILSON P.C.

15      /s/ *Phillip A. Silvestri*

/s/ *Megan H. Hummel*

16      \_\_\_\_\_  
17      Phillip A. Silvestri, Esq. (Bar No. 11276)  
18      3993 Howard Hughes Pkwy., Ste. 400  
19      Las Vegas, NV 89169

\_\_\_\_\_  
Joseph P. Garin, Esq. (Bar No. 6653)  
Megan H. Hummel, Esq. (Bar No. 12404)  
9900 Covington Cross Drive, Suite 120  
Las Vegas, Nevada 89144

19      Richard W. Epstein, Esq.  
20      (Admitted Pro Hac Vice)  
21      Jeffrey Backman, Esq.  
22      (Admitted Pro Hac Vice)  
23      Michelle E. Durieux, Esq.  
24      (Admitted Pro Hac Vice)  
25      200 East Broward Blvd., Ste. 1800  
26      Fort Lauderdale, FL 33301

*Attorneys for Defendant*  
*Schroeter Goldmark & Bender, P.S.*

23      COOPER LEVENSON, P.A.  
24      Kimberly Maxson-Rushton, Esq.  
25      Nevada Bar No. 5065  
26      Gregory A. Kraemer, Esq.  
27      Nevada Bar No. 10911  
28      R. Scott Rasmussen, Esq.  
Nevada Bar No. 6100  
1835 Village Center Circle  
Las Vegas, NV 89134

*Attorneys for Plaintiffs*

**ORDER**

IT IS SO ORDERED.

DATED: March 27, 2020



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UNITED STATES MAGISTRATE JUDGE